

EXHIBIT A

ID NO. 010761974
ROY H. BINDER & ASSOCIATES LLC
401 Hamburg Turnpike
Wayne, New Jersey 07470
(973) 942-6000
Attorneys for Plaintiffs

Superior Court of New Jersey
Account No. 140402

NEW JERSEY MANUFACTURERS INSURANCE COMPANY
as subrogee of PAUL UHLIK AND JESSICA ROSE and
NEW JERSEY MANUFACTURERS INSURANCE COMPANY, individually,

SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY
LAW DIVISION
Docket No.

PLAINTIFFS,

Civil Action

-v-

COMPLAINT
(M.V.)

UNITED STATES POSTAL SERVICE,
STEVEN COOPER,
JOHN DOE, A FICTITIOUS NAME,

DEFENDANTS,

Plaintiff, NEW JERSEY MANUFACTURERS INSURANCE COMPANY having a place of business at 301 SULLIVAN WAY, WEST TRENTON, NJ 08628, by way of Complaint against defendants says:

FIRST COUNT

1. On or about May 1, 2018, the motor vehicle owned by plaintiff's insureds, PAUL UHLIK and JESSICA ROSE, was involved in a motor vehicle accident at or near Dermott Avenue, Clifton, NJ.

2. At the time and place aforesaid, defendant UNITED STATES POSTAL SERVICE was the owner/lessee of a motor vehicle, which was then and there being operated by the defendant STEVEN COOPER as servant, agent or employee in a careless and negligent manner, and/or negligently entrusted the vehicle to or negligently allowed the operator to operate said vehicle, causing the defendant's motor vehicle to collide with the motor vehicle of plaintiff's insured.

3. The defendant, JOHN DOE, is a fictitious name for individual(s) or entity(s) responsible for the damages.

4. As a result thereof, the motor vehicle of plaintiff's insured was severely damaged, required extensive repairs, lost the use of said vehicle and suffered other related losses.

5. Upon information and belief, defendant owner was negligent in the event that they failed to carry automobile insurance as required by New Jersey Statutes resulting in a loss to plaintiff and/or defendant/owner was negligent for failing to tender payment pursuant to New Jersey Statutes.

WHEREFORE, judgment is demanded by plaintiff, NEW JERSEY MANUFACTURERS INSURANCE COMPANY as subrogee of PAUL UHLIK and JESSICA ROSE, against defendants for damages, together with prejudgment interest, attorneys' fees and costs of suit.

SECOND COUNT

1. The plaintiffs repeats each and every allegation contained in the First Count as if same were fully set forth herein at length.

2. As the result of the aforesaid, plaintiff was required to expend money on medical treatment on behalf of the injured parties involved in the accident under the terms of a Personal Injury Protection Policy on behalf of its insured.

3. Pursuant to statute plaintiff requests reimbursement of the monies paid to the provider of medical services.

4. If defendants are insured by a policy of automobile insurance, plaintiffs demands that this matter be submitted to Arbitration; plaintiffs makes a formal demand for Arbitration pursuant to the applicable Statutes.

WHEREFORE, judgment is demanded by plaintiff, NEW JERSEY MANUFACTURERS INSURANCE COMPANY, individually against defendants for damages, together with prejudgment interest, attorneys' fees and costs of suit.

CERTIFICATION

I HEREBY CERTIFY that the matter in controversy is not the subject matter of any other action pending in any Court nor of any arbitration proceedings and that no other action or arbitration is contemplated.

ROY H. BINDER & ASSOCIATES LLC
Attorneys for Plaintiffs

By: 

Roy H. Binder

Dated: April 10, 2020
Our File No. 20S-6058NJM

Civil Case Information Statement

Case Details: PASSAIC | Civil Part Docket# L-001178-20

Case Caption: NEW JERSEY MANUFACTURERS VS
UNITED STATES POSTA

Case Initiation Date: 04/15/2020

Attorney Name: ROY H BINDER

Firm Name: ROY H. BINDER & ASSOCIATES,LLC

Address: 401 HAMBURG TURNPIKE SUITE 303

WAYNE NJ 07470

Phone: 9739426000

Name of Party: PLAINTIFF : NEW JERSEY

MANUFACTURERS

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: AUTO NEGLIGENCE-PROPERTY DAMAGE

Document Type: Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

04/15/2020

Dated

/s/ ROY H BINDER

Signed

